

**IN THE UNITED STATES BANKRUPTCY COURT
OF THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	:	
JUSTIN A. LANG	:	Case No: 1-20-bk-02360-HWV
JAMIE L. LANG	:	
Debtors,	:	Chapter 13
	:	
	:	
CREDIT ACCEPTANCE CORPORATION:	:	
Movant	:	
	:	
v.	:	
	:	
JUSTIN A. LANG	:	
JAMIE L. LANG	:	
Respondents	:	
	:	
CHARLES J. DEHART, III	:	
Trustee	:	

**DEBTORS' ANSWER TO MOVANT'S MOTION FOR RELIEF FROM THE
AUTOMATIC STAY**

AND NOW COMES, Debtors, Justin A. Lang and Jamie L. Lang, by and through their attorneys, Jacobson, Julius & Harshberger, and hereby file this Answer to Movant's Motion for Relief from the Automatic Stay and in support thereof states as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted in part and denied in part. It is admitted that Debtors are behind. By way of additional response, Debtors hope that Movant will permit the Debtors to place the arrears in an amended plan or stipulation once the correct amount has been determined.
5. Paragraph 5 is a conclusion of law to which no response is required. To the extent a response is required, said averment is denied.

WHEREFORE, Debtors respectfully request that this Honorable Court deny Movant's Motion for Relief from the Automatic Stay and further requests any other relief deemed necessary and just.

Respectfully Submitted,

JACOBSON, JULIUS & HARSHBERGER

Dated: February 10, 2021

/s/Chad J. Julius
ID# 209496
8150 Derry Street
Harrisburg, PA 17111.5260
717.909.5858

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CERTIFICATE OF SERVICE

I, Dera Shade, paralegal with Jacobson, Julius & Harshberger, do hereby certify that on this day I served the within Respondent's Answer to Movant's Motion for Relief from the Automatic Stay upon the following persons via the ECF/CM system and/or by depositing a true and correct copy of the same in the United States Mail, first class, postage prepaid:

ECF/CM:

Charles J. Dehart III, Esquire (Trustee) PO Box 7005 Lancaster, PA 17604	William E. Craig, Esquire Morton & Craig LLC 110 Marter Avenue, Suite 301 Moorestown, NJ 08057
United States Bankruptcy Court Ronald Reagan Federal Building 228 Walnut Street, Room 320 Harrisburg, PA 17108	

/s/Dera Shade _____
Dera Shade, Paralegal
Jacobson, Julius & Harshberger
8150 Derry Street
Harrisburg, PA 17111
717.909.5858
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Dated: February 10, 2021